



Llywodraeth Cymru
Welsh Government

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New Warm Homes Programme: children's rights impact assessment

An assessment of how the new Warm Homes Programme affects children's rights.

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Policy objectives

The new Warm Homes Programme (WHP) will take over from Nest as the Welsh Government's primary mechanism to tackle fuel poverty. It will take a demand-led approach to support all households across Wales with advice to help improve energy efficiency, reducing fuel bills and carbon emissions. For eligible households, it will also offer energy retrofit measures to reduce running costs and hence reduce their risk of fuel poverty, whilst delivering associated carbon savings.

The new programme is similar to the current Nest programme, but takes greater account of the climate emergency and has been modified to learn lessons identified by Senedd Committees, the Welsh Audit Office and a diverse stakeholder group. For example, eligibility criteria are being extended to include those on low incomes as well as benefits. Another significant change is that gas boiler replacements will move to be the exception rather the default, with the programme instead favouring repair of fossil fuel assets and a shift towards low carbon heating instead. The focus on worst first and fabric first will remain unchanged, to ensure those who are worst off and in the poorest quality homes (in the private rented and owner-occupied sectors) are supported, as they are most likely to be in fuel poverty.

The aim of the scheme will be to improve homes by one EPC band or to Band E, whichever is higher (this enables EPC G homes to be uplifted by two bands). From a policy perspective this aligns with a 'worst first' approach, and while it enables deeper improvements on the worst properties, it means more non-EPC G homes can also be supported.

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Gathering evidence and engaging with children and young People

We know from existing research that children are more likely to be in relative income poverty than the population overall. A literature review by the Centre for Research in in Early Childhood (CREC) indicates that in the UK, especially, parents' socio-economic status continues to be the primary predictor of which children prosper in adult life. They report that the magnitude of early childhood inequality in the UK is well-documented; some estimates suggest that half the attainment gaps for pupils are already present at the start of primary school. Using Millennium Cohort study data, this research shows large gaps exist in the UK for vocabulary tests between children aged 4 and 5 from families with middle incomes and those from families with lowest fifth of incomes.

The most recent Welsh Government published data on the number of households in **fuel poverty in Wales was in 2021**:

- 14% of all households (196,000 households) and vulnerable households (169,000 households) were living in fuel poverty.
- 3% of all households (38,000) were living in severe fuel poverty and 11% (153,000) were at risk of fuel poverty.
- 4% of households with two adults and children were in fuel poverty.
- Two-adult household with children in fuel poverty accounted for 5% and single parent households in fuel poverty was 6%.

Vulnerable households are defined as those with a person aged 60 years or over, a dependent child or children under the age of 16 years, a single person household aged under 25 and/or a person living with a long-term illness or who is disabled.

Since 2021 and in light of the energy crisis, **estimates suggest rates of fuel poverty could have risen as high as 45% (April 2022)**.

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There is a relatively well-evidenced link between fuel poverty and poor health, and **research has suggested (GOV.UK)** that poor health outcomes in children, such as asthma or depression, could lead to poorer performance in school, causing knock-on effects for their income later in life. Significant negative effects of cold housing are evident in terms of infants' weight, hospital admission rates, developmental status, and the severity and frequency of asthmatic symptoms. **Mental health is negatively affected by fuel poverty and cold housing (Institute of Health Equality)** for any age group, this can be monitored by looking at children's school attendance.

For teenagers, the cost of poor housing to their educational attainment is highly significant as this is a crucial time in a teenager's life in terms of education and social development. The impact will be significant if they fail to achieve their goals such as university or a trade. Social stigma around poor housing can also impact teenagers' confidence and sense of social wellbeing which can impact them later in life. These issues not only affect the individual, but family members and the community who often are left with the responsibility of supporting the teenager's mental health.

This policy will aim to reduce fuel poverty across Wales by providing energy efficiency advice to all, and direct support to eligible homes with the installation of appropriate measures. Given that households with children in Wales account for **26.5% of all households** and houses with children that are in fuel poverty account for **11% of the fuel poor population**, it is likely that the policy will bring about a positive impact for children and young people, in particular children who experience inequality because of their social and economic status.

From 2009 to 2021 the percentage of ethnic minority households in fuel poverty went down from 39.4% to 19.1%, in the same period the percentage of white households in fuel poverty **went down from 20.3% to 12.6% (Gov.uk)**. This means children in ethnic minority households are more likely to be in fuel poor households and as such are likely to benefit from the Warm Homes Programme.

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Otherwise, children of all ages will likely benefit equally, as will those who are disabled or have additional learning needs. Gypsies, Roma and Travellers children as well as children living in, for example, park homes and other non-standard accommodations may be less likely to benefit as the measures available are best suited for standard dwellings (for example, loft insulation and heat pumps). However, all families are eligible for advice.

Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

Due to the scope of the work being around retrofitting and fuel poverty, we believe that engagement directly with children (16 or under) would not be appropriate. End Child Poverty Network, did provide representation through their response to the consultation and children and young people should still experience the benefit of the approach.

Analysing the evidence and assessing the impact

This policy will aim to reduce fuel poverty across Wales by providing energy efficiency advice to all, and direct support to eligible homes with the installation of appropriate measures.

The approach is likely to deliver improved thermal comfort to children across Wales, resulting in improved health and educational outcomes. It should also deliver reduced energy bills, freeing up household funds for other goods and services. Finally, it should reduce carbon emissions and improve air quality, delivering a better environment for children and young people to grow up in.

While not all children will be eligible for the full offer of support, there are no negative effects envisaged from the programme.

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How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols?

Article 6 - All children have the right of life. Governments should ensure that children survive and develop healthily.

Enhances children's rights. Government should ensure that children survive and develop healthily. This programme will provide energy efficiency improvements to low income families. These changes will result in better living conditions in the homes and aim to bring families out of fuel poverty. This will improve the quality of life for children in the home.

Article 27 - Children have a right to a standard of living that is good enough to meet their physical and mental needs. The Government should help families who cannot afford to provide this.

Challenges children's rights. This programme will help families across Wales with advice and will provide energy efficiency improvements to low income families in EPC G, F, E and D houses. These changes will result in better living conditions in the homes, reduced energy bills and reduced emissions, all of which will improve the quality of life for children in the home.

Article 34 - The Government should protect children from sexual abuse.

If the works are required to be performed on a household with children, then the contractors carrying out the work must be subjected to sufficient checks in order to safeguard children. This is unlikely to include enhanced DBS check since the

contractors are not expected to be eligible as they are not delivering regulated activity or operating in regulated premises.

Consider whether any EU Citizens Rights (as referenced in the Equality Impact Assessment) relate to young people up to the age of 18.

Article 27, which recognises “the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development” is relevant here as the programme should help to ensure that children living in the worst quality homes in the least well-off families are given direct support to improve their standard of living.

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